

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BARBARA M. GESIAKOWSKI,	)	
	)	
Plaintiff,	)	
	)	Case No. 20-CV-00656
vs.	)	
	)	Hon. Judge John Z. Lee
MORREALE, BRADY, MALONE &	)	
CWIK, P.C., JOHN F. MORREALE, THE	)	Hon. Magistrate Judge Maria Valdez
LASALLE NETWORK, INC.,	)	
	)	
Defendants.	)	

**DEFENDANTS' OPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR  
OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants Morreale, Brady, Malone & Cwik, P.C., John F. Morreale, and LaSalle Network, Inc. ("LaSalle"), by and through their undersigned attorneys, respectfully move the Court for a 30-day extension of time, until August 24, 2020, to answer or otherwise plead to Plaintiff's First Amended Complaint. In support of this Motion, Defendants state as follows:

1. On March 4, 2020, Plaintiff filed her First Amended Complaint, alleging sex and disability discrimination, harassment, and retaliation during her four (4) day temporary work assignment at Morreale, Brady, Malone & Cwik, P.C. (Dkt. 11).
2. On March 10, 2020, Plaintiff filed a motion requesting that her counsel be allowed to withdraw from the case and that she be given time to seek new counsel. (Dkt. 14).
3. On March 12, 2020, LaSalle moved to vacate all deadlines in order to avoid having to expend time and resources in responding to the First Amended Complaint as Plaintiff's new counsel may amend the Complaint again once they are brought on the case. (Dkt. 18). Defendants Morreale, Brady, Malone & Cwik, P.C. and John F. Morreale later joined that motion. (Dkt. 23 & 26).

4. On April 1, 2020, the Court entered an Order allowing Plaintiff's counsel to withdraw, giving Plaintiff additional time to seek new counsel, and striking all deadlines in the case. (Dkt. 29).

5. On June 22, 2020, Plaintiff filed her initial status report. In the report, Plaintiff stated that she was currently representing herself, but was still trying to obtain new counsel and requested additional time to do so. (Dkt. 35).

6. On June 23, 2020, the Court denied Plaintiff's request for additional time to seek new counsel, lifted the stay, and set the deadline for Defendants to answer or otherwise plead on July 24, 2020. (Dkt. 37).

7. Since Plaintiff is now representing herself, Defendants have initiated settlement discussions with her and made a good faith offer in an effort to resolve this matter. Defendants would like the opportunity to fully explore resolution before undertaking the time and expense of preparing their responsive pleadings and gathering the information and documents necessary to comply with the Court's Mandatory Initial Discovery Program requirements.

8. Additionally, counsel for all parties have been juggling the resetting of deadlines in several cases as the State of Illinois begins reopening amidst the Covid-19 pandemic. Counsel for Morreale, Brady, Malone & Cwik, P.C. and John Morreale ("MBMC Defendants"), Laura Ranum, has been preparing for depositions scheduled in the month of July and early August in three (3) federal cases and is still without full-time childcare due to the pandemic. Similarly, David Brueggen, counsel for MBMC Defendants has been preparing for depositions scheduled in the month of July and early August in two (2) cases, both currently pending in the Northern District of Illinois.

9. Accordingly, Defendants request an additional thirty (30) days, until August 24, 2020, to answer or otherwise plead to Plaintiff's First Amended Complaint.

10. Counting the motion to vacate, previously filed in March, this is the second request for an extension by Defendants. (Dkt. 18 & 23).

11. Plaintiff has been advised of Defendants' Motion for extension of time and opposes it.

12. This Motion is made in good faith and is not presented for any improper purpose, such as to harass or cause unnecessary delay.

WHEREFORE, Defendants respectfully request the Court to enter an Order extending the time to answer or otherwise plead to Plaintiff's First Amended Complaint, to and including August 24, 2020.

Date: July 20, 2020

Respectfully submitted,

/s/ Laura M. Ranum  
LAURA M. RANUM, Atty. No. 6300636  
*One of the Attorneys for Defendants*  
*John Morreale and Morreale, Brady,*  
*Malone & Cwik, P.C.*  
James G. Sotos  
Laura M. Ranum  
David A. Brueggen  
THE SOTOS LAW FIRM, P.C.  
141 W. Jackson Blvd., #1240A  
Chicago, IL 60604  
(630) 735-3300  
[lr anum@jsotoslaw.com](mailto:lr anum@jsotoslaw.com)

/s/ Kathryn Montgomery Moran  
KATHRYN MONTGOMERY MORAN  
Atty No. 6194244  
*One of the Attorneys for Defendant*  
*LaSalle Network, Inc.*  
Kathryn Montgomery Moran  
Shavaun Adams Taylor  
Jackson Lewis P.C.  
150 N. Michigan Ave, Suite 2500  
Chicago, IL 60601  
(312) 803-2511  
[kathryn.moran@jacksonlewis.com](mailto:kathryn.moran@jacksonlewis.com)  
[shavaun.taylor@jacksonlewis.com](mailto:shavaun.taylor@jacksonlewis.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 20, 2020, she caused a true and correct copy of the foregoing Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's First Amended Complaints to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system and via U.S. Mail to:

Barbara M. Gesiakowski  
2324 Overlook Court  
Naperville, IL 60563

By: /s/ Kathryn Montgomery Moran